

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**HUNTER HARRIS and  
CORA CLUETT,  
Plaintiffs**

**V.**

**UNIVERSITY OF MASSACHUSETTS  
LOWELL, JACQUELINE MOLONEY,  
UNIVERSITY OF MASSACHUSETTS  
BOSTON, MARCELO SUÁREZ-  
OROZCO and SHAWN DE VEAU  
Defendants**

**NO. 1:21-CV-11244-DJC**

**PLAINTIFF'S PARTIAL ASSENT AND OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS**

Plaintiffs assent to the dismissal of defendants UMass Boston and UMass Lowell, as they have not consented to Federal Court Jurisdiction. However, plaintiffs OPPOSE the individual defendants' 12(b)(6) motion to dismiss their claims, which was supported by a combined memorandum in opposition to plaintiffs Motion for Preliminary Injunction. In this opposition memorandum, defendants failed to show that plaintiffs did not meet the pleading requirements under Fed. R. Civ. P. 8, and the basis of their Motion to Dismiss is identical to the basis for their Opposition to the merits of Plaintiffs' Motion for Preliminary Injunction, which will be heard on August 26, 2021.

Plaintiffs, by their attorney,

/s/ Ryan P. McLane

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